

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 11
)	
STAR CHAIN, INC.,)	CASE NO. 19-65768
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Debtor.)	

IN RE:)	CHAPTER 11
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SC RESTAURANT MANAGEMENT, LLC,)	CASE NO. 19-65802
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Debtor.)	

IN RE:)	CHAPTER 11
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OMER CASURLUK,)	CASE NO. 19-65803
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 1, LLC,)	CASE NO. 19-65770
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 3, LLC,)	CASE NO. 19-65771
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 5, LLC,)	CASE NO. 19-65772
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 6, LLC,)	CASE NO. 19-65773
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 8, LLC,)	CASE NO. 19-65774
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 9, LLC,)	CASE NO. 19-65775
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 10, LLC,)	CASE NO. 19-65776
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 11, LLC,)	CASE NO. 19-65778
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 12, LLC,)	CASE NO. 19-65779
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 16, LLC,)	CASE NO. 19-65780
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 17, LLC,)	CASE NO. 19-65783
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 18, LLC,)	CASE NO. 19-65784
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 19, LLC,)	CASE NO. 19-65785
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 20, LLC,)	CASE NO. 19-65787
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 21, LLC,)	CASE NO. 19-65788
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 26, LLC,)	CASE NO. 19-65789
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 27, LLC,)	CASE NO. 19-65791
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 30, LLC,)	CASE NO. 19-65792
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 31, LLC,)	CASE NO. 19-65801
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 32, LLC,)	CASE NO. 19-65794
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 33, LLC,)	CASE NO. 19-65795
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 36, LLC,)	CASE NO. 19-65800
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Debtor.)	

IN RE:)	CHAPTER 11
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US STAR 39, LLC,)	CASE NO. 19-65797
)	
Debtor.)	

IN RE:)	CHAPTER 11
)	
US STAR 41, LLC,)	CASE NO. 19-65798
)	
Debtor.)	

**EMERGENCY MOTION FOR JOINT ADMINISTRATION OF RELATED CASES
PURSUANT TO RULE 1015 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE**

COME NOW Star Chain, Inc.; SC Restaurant Management, LLC; Omer Casurluk; US Star 1, LLC; US Star 3, LLC; US Star 5, LLC; US Star 6, LLC; US Star 8, LLC; US Star 9, LLC; US Star 10, LLC; US Star 11, LLC; US Star 12, LLC; US Star 16, LLC; US Star 17, LLC; US Star 18, LLC; US Star 19, LLC; US Star 20, LLC; US Star 21, LLC; US Star 26, LLC; US Star 27, LLC; US Star 30, LLC; US Star 31, LLC; US Star 32, LLC; US Star 33, LLC; US Star 36, LLC; US Star 39, LLC; and US Star 41, LLC, the debtors and debtors-in-possession in the above-styled Chapter 11 cases (collectively the “Debtors”), and move this Court for entry of an Order to jointly administer these cases pursuant to §105, Title 11 U.S.C. and Rule 1015(b), Federal Rules of Bankruptcy Procedure. In support hereof Debtors respectfully show this Court as follows:

1.

This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2.

Each of the Debtors filed a voluntary petition for relief under the provisions of Chapter 11, Title 11 U.S.C. on October 2, 2019. All of these cases were filed in the Bankruptcy Court for the Northern District of Georgia, Atlanta Division. Debtors continue to manage their assets and operate their businesses as debtors-in-possession, no trustee having been appointed. No Official Creditors Committee has yet been appointed in this case.

3.

Debtor Star Chain, Inc. is a Georgia-based company that operates as the management company for all affiliated “US Star” debtors. The affiliated “US Star” debtors operate approximately 4 dozen restaurants with franchisors Captain D’s, Checkers, Newk’s, and Yogli Mogli. The Debtors’ membership interests are owned by the same person, Omer Casurluk. The Debtors have common secured creditors and are part of one business operation.

4.

The debtors are affiliates as that term is defined in § 101(2), Title 11 U.S.C.

RELIEF REQUESTED

5.

Debtors request that their bankruptcy cases be jointly administered pursuant to Bankruptcy Rule 1015(b), such that a single docket is utilized for matters occurring in the administration of these cases, including:

- A. The filing of pleadings, orders, notices and other papers, with the exception of proofs of claim;
- B. The combining of notices to creditors of the different estates; and
- C. The joint handling of purely administrative matters that may expedite these cases and render the process less costly.

6.

The Debtors further request that docket entries be made in their cases substantially as follows: “An Order has been entered in this case directing the procedural, but not substantive, consolidation and joint administration of the Chapter 11 cases of Star Chain, Inc.; SC Restaurant Management, LLC; Omer Casurluk; US Star 1, LLC; US Star 3, LLC; US Star 5, LLC; US Star 6, LLC; US Star 8, LLC; US Star 9, LLC; US Star 10, LLC; US Star 11, LLC; US Star 12, LLC; US Star 16, LLC; US Star 17, LLC; US Star 18, LLC; US Star 19, LLC; US Star 20, LLC; US Star 21, LLC; US Star 26, LLC; US Star 27, LLC; US Star 30, LLC; US Star 31, LLC; US Star 32, LLC; US Star 33, LLC; US Star 36, LLC; US Star 39, LLC; and US Star 41, LLC. The docket in case number 19-65768 should be consulted for all matters affecting this case.”

BASIS FOR RELIEF REQUESTED

7.

This Court may order the joint administration of the estates of a debtor and its affiliates pursuant to Bankruptcy Rule 1015(b). As discussed above, Debtors are affiliates as that term is defined in § 101(2), Title 11 U.S.C.

8.

Joint administration of the separate estates of the Debtors is appropriate. Because of the financial and other relationships of the Debtors, entry of an Order permitting joint administration of these cases would avoid unnecessary time and expense by obviating the necessity of multiple and duplicative motions and applications, entering duplicative orders, and service of duplicative notices to creditors.

9.

The rights of creditors of the separate estates of Debtors will not be adversely affected by joint administration since the relief sought is purely procedural and will not affect a creditor's substantive rights. Each creditor will retain whatever rights it may have against a particular Debtor and its estate. Indeed, the impact on creditors will be positive by the reduction in costs resulting from joint administration. The Court and Clerk's Office will be relieved of the burden of entering duplicative orders and maintaining multiple files. Finally, joint administration will simplify the United States Trustee's tasks of supervising the administrative aspects of these cases.

10.

Debtors request that this Motion be considered on an expedited basis to limit administrative costs in these cases.

11.

Notice of the Joint Administration Motion has been served on the Office of the United States Trustee for the Northern District of Georgia. Debtors submit that given the procedural nature of the relief sought herein, such notice is sufficient and no further notice is required.

12.

Debtors have filed Notices of Designation of Complex Chapter 11 Cases pursuant to this Court's General Order No. 26-2019. Attached hereto as Exhibit "A" is the Affidavit of William A. Rountree, which establishes that the joint administration of Debtors' cases is warranted and will ease the administrative burden of the Court and the parties. *See* General Order No. 26-2019, ¶ (C)(1). Filed concurrently herewith in the proposed lead case is a List of the 30 Largest Unsecured Creditors on a Consolidated Basis. *See* General Order No. 26-2019, ¶ (C)(2).

WHEREFORE, Debtors respectfully request that the Court (a) grant the Joint Administration Motion in their bankruptcy cases by ordering that each case be administered under In re: Star Chain, Inc., Case No. 19-65768; (b) enter an order in substantially the same form attached hereto as "Exhibit B" providing for joint administration of these twenty-seven cases; and (c) grant such further relief as the Court deems just and proper.

Dated: October 2, 2019.

Debtor-in-Possession, by:

/s/ Will B. Geer

Will B. Geer

Georgia State Bar No. 940493

WIGGAM & GEER, LLC

50 Hurt Plaza, SE, Suite 1150

Atlanta, Georgia 30303

T: (404) 233-9800

F: (404) 287-2767

wgeer@wiggamgeer.com

-and-

Signature on following page

/s/ William A. Rountree

William A. Rountree

Georgia State Bar No. 616503

ROUNTREE LEITMAN & KLEIN, LLC

Century Plaza I

2987 Clairmont Road, Ste. 175

Atlanta, Georgia 30329

T: (404)584-1238; F:(404)704-0246

wrountree@rlklawfirm.com

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:

STAR CHAIN, INC., SC RESTAURANT
MANAGEMENT, LLC, OMER
CASURLUK, US STAR 1, LLC, US STAR
3, LLC, US STAR 5, LLC, US STAR 6,
LLC, US STAR 11, LLC, US STAR 12,
LLC, US STAR 16, LLC, US STAR 17,
LLC, US STAR 18, LLC, US STAR 19,
LLC, US STAR 20, LLC, US STAR 21,
LLC, US STAR 26, LLC, US STAR 27,
LLC, US STAR 30, LLC, US STAR 31,
LLC, US STAR 32, LLC, US STAR 33,
LLC, US STAR 36, LLC, US STAR 39,
LLC, US STAR 41, LLC,

Debtors.

CHAPTER 11

CASE NO. 19-65768

AFFIDAVIT OF WILLIAM A. ROUNTREE

STATE OF GEORGIA

COUNTY OF DEKALB

Personally appeared before the undersigned attesting officer authorized to administer oaths,
William A. Rountree who, after being duly sworn, on oath deposes and says:

1.

My name is William A. Rountree. I am over the age of 18 and am of sound and competent
mind. The statements made in this affidavit are based on my personal knowledge.

2.

I am co-counsel for the above-referenced Debtors in the above-styled Chapter 11 case (collectively the "Debtors"). I make this affidavit in support of the Debtors' Emergency Motion for Joint Administration of Related Cases Pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure, filed concurrently herewith, and pursuant to Paragraph (C)(1) of this Court's General Order No. 26-2019, which establishes procedures to be used in the United States Bankruptcy Court for the Northern District of Georgia in "Complex Chapter 11 Cases."

3.

Joint administration of the Debtors' cases is warranted and will ease the administrative burden for the Court and the parties. The Debtors consist of 27 entities in 27 Chapter 11 cases. Debtor Star Chain, Inc. is a Georgia-based company that operates as the management company for all affiliated "US Star" debtors. The affiliated "US Star" debtors operate approximately 4 dozen restaurants with franchisors Captain D's, Checkers, Newk's, and Yogli Mogli. The Debtors' membership interests are owned by the same person, Omer Casurluk. The Debtors have common secured creditors and are part of one business operation.

4.

Pursuant to Paragraph (C)(2) of General Order No. 26-2019, a List of 30 Largest Unsecured Creditors on a Consolidated Basis is filed concurrently herewith.

FURTHER AFFIANT SAYETH NOT.

Sworn to and subscribed
before me this 9th day
of October, 2019.

NOTARY PUBLIC



William A. Rountree

Exhibit "B"

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

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US STAR 41, LLC,)	CASE NO. 19-65798
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**ORDER AUTHORIZING JOINT ADMINISTRATION
OF RELATED CASES**

The above-referenced Chapter 11 bankruptcy cases are before the Court on the Motion for Order Authorizing Joint Administration of Related Cases Under Rule 1015 of the Federal Rules of Bankruptcy Procedure (“Joint Administration Motion”) filed by Debtors on October 2, 2019. In the Joint Administration Motion, Debtors requested authorization under Rule 1015 of the Federal

Rules of Bankruptcy Procedure to jointly administer the above-referenced bankruptcy cases. After reviewing the Joint Administration Motion, the Court has concluded that the Joint Administration Motion and the relief requested therein are appropriate. Accordingly, the Joint Administration Motion is hereby GRANTED.

IT IS FURTHER ORDERED that these Chapter 11 cases shall be jointly administered under the case name In re: Star Chain, Inc., Case No. 19-65768, in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure; and

IT IS FURTHER ORDERED that the joint caption shall read as follows:

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 11
)	Jointly Administered Under
STAR CHAIN, INC., et al.,)	
)	CASE NO. 19-65768
<u>Debtors.</u>)	

IT IS FURTHER ORDERED that all original docket entries shall be made in the case of Star Chain, Inc., Case No. 19-65768, and a docket entry shall be made in the jointly administered cases substantially as follows:

In accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure, an order has been entered in this case authorizing the joint administration of this case with the Chapter 11 case of **In re: Star Chain, Inc.** The docket in Case No. 19-65768 should be consulted for all matters affecting this case. All further pleadings or other papers in this case, and the others jointly administered, shall be filed in the case of Star Chain, Inc., Case No. 19-65768.

IT IS FURTHER ORDERED that a separate claims register shall be maintained in each case; and

IT IS FURTHER ORDERED that counsel for Debtors shall serve a copy of this Order on the United States Trustee and all parties listed on the matrices filed in Debtors' cases within 5 business days of entry of this Order.

-End of Document-

Prepared and presented by:

/s/ William A. Rountree

William A. Rountree

Georgia State Bar No. 616503

ROUNTREE LEITMAN & KLEIN, LLC

Century Plaza I

2987 Clairmont Road, Ste. 175

Atlanta, Georgia 30329

(404) 584-1238 (telephone)

(404) 704-0246 (facsimile)

wroundtree@rlklawfirm.com

Identification of Parties to be served:

Will B. Geer
Wiggam & Geer, LLC
Georgia Bar Number: 940493
50 Hurt Plaza, SE, Suite 1245
Atlanta, Georgia 30303

William A. Rountree
Rountree Leitman & Klein, LLC
Century Plaza I
2987 Clairmont Road, Suite 175
Atlanta, Georgia 30329

Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, S.W.
Atlanta, GA 30303

CERTIFICATE OF SERVICE

This is to certify that on this date I filed the foregoing **EMERGENCY MOTION FOR JOINT ADMINISTRATION OF RELATED CASES PURSUANT TO RULE 1015 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE** using the Court's CM/ECF system and served a true and correct copy upon the following parties by overnight mail, facsimile transmission, or electronic mail:

Office of the U.S. Trustee
362 Richard B. Russell Building
75 Ted Turner Drive, SW
Atlanta, Georgia 30303
USTP.Region21@usdoj.gov
ustpreion21.at.ecf@usdoj.gov

Dated: October 2, 2019.

/s/ William A. Rountree
William A. Rountree
Georgia State Bar No. 616503